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Attorneys for Plaintiff
TAYLOR THOMSON

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Taylor Thomson

Plaintiff,

v.

Persistence Technologies BVI Pte Ltd.,
Tushar Aggarwal, Ashley Richardson,

Defendants.

Case No. 2:23-cv-04669-MEMF-MAR

**PLAINTIFF TAYLOR THOMSON'S
REQUEST FOR LEAVE OF COURT
TO APPEAR TELEPHONICALLY AT
THE MOTION HEARING SET FOR
NOVEMBER 12, 2025**

The Honorable Margo A. Rocconi,
United States Magistrate Judge

Date: November 12, 2025

Time: 11:00 a.m.

Courtroom: 790

1 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR
2 ATTORNEYS OF RECORD HEREIN:

3 Plaintiff Taylor Thomson by and through her attorneys of record, respectfully
4 requests that counsel for Plaintiff be allowed to appear telephonically by the Court's
5 Zoom link at the motion hearing, currently scheduled for November 12, 2025 at 11:00
6 a.m. in Courtroom 790 of the Edward R. Roybal Federal Building and United States
7 Courthouse before the Honorable Magistrate Judge Margo A. Rocconi. While Attorney
8 Julian L. André will be attending in person, lead counsel Attorney Todd Harrison is
9 located in New York and can only appear telephonically. Good cause exists for this
10 request as Mr. Harrison's appearance by Zoom will avoid the significant time and
11 expense associated with cross-country travel while still allowing him to fully
12 participate in the proceedings.

13 Dated: November 4, 2025

MCDERMOTT WILL & SCHULTE LLP

14 By: /s/ Julian L. André
15 JULIAN L. ANDRE

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17 Attorneys for Plaintiff
18 TAYLOR THOMSON
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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in Los Angeles, California. My business address is McDermott Will & Schulte, LLP, 2049 Century Park East, Suite 3200, Los Angeles, CA 90067. I am over the age of eighteen years and not a party to this action.

On November 4, 2025, I caused to be served copies of the following documents:

**PLAINTIFF TAYLOR THOMSON'S REQUEST FOR LEAVE TO APPEAR
TELEPHONICALLY AT THE MOTION HEARING SET FOR NOVEMBER
12, 2025; [PROPOSED] ORDER**

on the following party via email and U.S. Mail:

Ashley Richardson
25399 Markham Lane
Salinas, CA 93908
ashrichardson@mac.com

Defendant in Pro Per

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on November 4, 2025 in Los Angeles, California.

/s/ Joshua Yim

Joshua Yim